

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

NATIONAL COUNCIL FOR ADOPTION  
BUILDING ARIZONA FAMILIES on behalf  
of itself and its birth-parent clients, birth  
parents D.V. and N.L., and baby boy T.W. by  
and through his guardian ad litem PHILIP  
(JAY) MCCARTHY, JR.,

Plaintiffs,

v.

SALLY JEWELL, in her official capacity as  
Secretary of the United States Department of  
the Interior, KEVIN WASHBURN, in his  
official capacity as Assistant Secretary of  
Indian Affairs, BUREAU OF INDIAN  
AFFAIRS, and the UNITED STATES  
DEPARTMENT OF THE INTERIOR,

Defendants.

Civil Action No. 1:15cv00675

**MOTION OF NATIONAL CONGRESS OF AMERICAN INDIANS, ASSOCIATION ON  
AMERICAN INDIAN AFFAIRS, AND NATIONAL CHILD WELFARE ASSOCIATION  
FOR LEAVE TO FILE BRIEF AS *AMICI CURIAE***

Pursuant to Rule 7(a) of the Local Rules of the Eastern District of Virginia, the National Congress of American Indians, the Association on American Indian Affairs, and the National Indian Child Welfare Association, by and through undersigned counsel, file this motion for leave to file a brief as *amici curiae* in the above-captioned case in support of Defendants' Motion to Dismiss (Doc. 51). The grounds for this motion are stated with particularity in the accompanying memorandum of law. If permitted to appear, *amici* respectfully request that this Court consider the *amici curiae* brief submitted contemporaneously with this motion.

Counsel for *amici* have contacted all parties to seek consent to file this motion; Defendants consent to the filing of the motion, and Plaintiffs take no position on the motion.

Dated: September 18, 2015

Respectfully submitted,

/s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of September, 2015, that I electronically filed with the Clerk the foregoing using the Court's Electronic CM/ECF System and that service was thereby accomplished upon:

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